

# EXHIBIT 6

FLONES v. BEAUMONT HEALTH SYSTEM

MICHAEL WOOLSEY

December 14, 2012

*Prepared for you by*

  
NATIONWIDE COURT REPORTING & VIDEO

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1           that a level that's less than a level one?

2    A.    Yes.

3    Q.    Okay.  What is that for?

4    A.    Counselings can be used to bring a problem either a  
5           behavioral issue or a performance issue to the  
6           attention of an employee to give them the opportunity  
7           to correct the behavior prior to resulting in a formal  
8           plan for improvement.

9    Q.    Okay.  What effect -- if your first discipline is a  
10           counseling, would your next discipline then be a level  
11           one?

12   A.    It's not required that first disciplines result in  
13           counseling --

14   Q.    Okay.

15   A.    -- by policy.

16   Q.    All right.  But if in fact -- what I'm trying to  
17           understand is is there a progression so that if you  
18           were written up as a level one and you caught a second  
19           case or you had a second issue would that  
20           automatically then become a level two?

21   A.    With the -- yes, with the exception of attendance  
22           and -- time and attendance issues, which are handled  
23           under a separate track.

24   Q.    All right.  If in fact your first counseling was a  
25           review level counseling, not a level one, would your

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1 next event put you in a level one?

2 A. Depends on the nature of the infraction.

3 Q. Okay. But assuming it wasn't some intentional  
4 severe-type thing, severe like you talked about, there  
5 would be a progression from counseling to level one?

6 A. Correct.

7 Q. So it matters where you start basically in how the  
8 process works, absent some egregious behavior that  
9 calls for escalation, an immediate escalation?

10 A. Yes.

11 Q. Like for example I assume that if you got caught  
12 stealing even if it was your first offense you'd be a  
13 level three and you'd be out?

14 A. Correct.

15 Q. Okay. But if they're mistakes, generalized mistakes  
16 without any intent or deliberate action, you normally  
17 would follow the progression?

18 A. Correct.

19 Q. And if you started at counseling, the next progression  
20 would be a level one?

21 A. Generally speaking, yes.

22 Q. And if you start at a level one, the next progression  
23 would be a level two?

24 A. Generally speaking, yes.

25 Q. Okay. Now, take a moment and look at Deposition